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was that the injury had existed before the commencement of the employment. After a hearing before the arbitration committee and a review of its findings by the Arbitration Commissioner, compensation was refused. The plaintiff appealed to the district court, which, on the evidence taken before the committee and the Commissioner, reversed the decision of the Commissioner. The defendant appealed on the ground that, since the evidence was conflicting, the findings of the Commissioner on questions of fact were conclusive. *Held*, that the judgment of the district court be reversed. *Hughes v. Cudahy Packing Co.*, 185 N.W. 614 (Iowa).

The decision in the principal case is in accord with the majority of state decisions relative to the conclusiveness of administrative findings of fact in workmen's compensation cases. But the Supreme Court has not decided whether such procedure affords due process. See, however, *Hawkins v. Bleakly*, 243 U.S. 210, 214-216. In cases involving postal privileges, the issue of land patents, and taxation, administrative findings of fact may be made conclusive in the absence of arbitrariness. *Bates and Guild Co. v. Payne*, 194 U.S. 106; *Johnson v. Drew*, 171 U.S. 93; *Hilton v. Merritt*, 110 U.S. 97. Cf. *American School of Magnetic Healing v. McAnnulty*, 187 U.S. 94. See E. F. Albertsworth, "Judicial Review of Administrative Action," 35 HARV. L. REV. 127, 136-143. It has even been held that the findings of immigration officials, when the fact in question is United States citizenship, may be final. *Ju Toy v. United States*, 198 U.S. 253. This position is extreme, however, and later utterances of the Court indicate that it will be astute to find any element of arbitrariness in the course of the proceedings. *Kwock Jan Fat v. White*, 253 U.S. 454; *Chin Yow v. United States*, 208 U.S. 8, 12. See Nathan Isaacs, "Judicial Review of Administrative Findings," 30 YALE L. J. 781. On the other hand, in proceedings regarding rate regulation there must be review by a court exercising "independent judgment." *Ohio Valley Water Co. v. Ben Avon Borough*, 253 U.S. 287. See L. Curtis, 2nd, "Judicial Review of Commission Rate Regulation," 34 HARV. L. REV. 862; T. P. Hardman, "Judicial Review as a Requirement of Due Process," 30 YALE L. J. 681. Judicial review of findings of fact in workmen's compensation cases would tend to defeat one of the principal objects of the acts, the furnishing of a cheap and speedy procedure, which, though perhaps rough, has been deemed more socially desirable than the more refined but, in practice, inadequate relief afforded by judicial justice. See Thomas R. Powell, "The Workmen's Compensation Cases," 32 POL. SCI. QUART. 542, 551-560. The need is obvious, and the Court will probably uphold this legislative conception of due process. See *Gundling v. Chicago*, 177 U.S. 183, 188; *Holden v. Hardy*, 169 U.S. 366.

ADMIRALTY — JURISDICTION — STATE WORKMEN'S COMPENSATION ACTS AS APPLIED TO MARITIME ACCIDENTS. — A carpenter, aiding in the construction of a vessel which had previously been launched on a river within the Federal admiralty jurisdiction, was accidentally injured in the course of his employment. He had previously accepted the provisions of a state Workmen's Compensation Act which provided an exclusive remedy. (See 1920 OLSON'S OREGON LAWS, § 6605; 1913 OREG. LAWS, c. 112.) He brings a libel in admiralty on the theory of maritime tort. *Held*, that the libelant do not recover. *Grant Smith-Porter Ship Co. v. Rhode*, U.S. Sup. Ct., October Term, 1921, No. 35.

A stevedore was injured in the course of his employment while standing on a wharf. He seeks to recover under an elective Workmen's Compensation Act. (1919 ME. LAWS, c. 238.) *Held*, that the plaintiff recover. *Berry v. M. F. Donovan & Sons, Inc.* 115 Atl. 250 (Me.).

For a discussion of the principles involved, see NOTES, *supra*, p. 743.

ADVERSE POSSESSION — AGAINST WHOM TITLE MAY BE GAINED — MUNICIPALITY — ADVERSE POSSESSION OF "ABANDONED" HIGHWAY. — The de-